

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND (State Bar No. 083013)
STEPHEN J. NEWMAN (State Bar No. 181570)
JULIETA STEPANYAN (State Bar No. 280691)
 2029 Century Park East
 Los Angeles, CA 90067-3086
 Telephone: 310-556-5800
 Facsimile: 310-556-5959
 Email: *lcalendar@stroock.com*

Attorneys for Defendant
CHASE BANK USA, N.A., erroneously sued as
JPMORGAN CHASE BANK

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

LESLIE SMITH,
Plaintiff,
vs.

Case No. 5:16-cv-02192-EJD

EXPERIAN INFORMATION SOLUTIONS, INC.; EQUIFAX, INC.; TRANSUNION LLC;
AMERICAN EXPRESS COMPANY;
JPMORGAN CHASE BANK; HSBC BANK
USA, NATIONAL ASSOCIATION; WESCOM
CENTRAL CREDIT UNION; BANK OF
AMERICA, NATIONAL ASSOCIATION and
DOES 1 through 100 inclusive,
Defendants.

**STIPULATION TO FURTHER
CONTINUE DEADLINE FOR
DEFENDANT CHASE BANK USA, N.A.
TO RESPOND TO COMPLAINT FROM
JUNE 14, 2016, TO JUNE 28, 2016,
PURSUANT TO LOCAL RULE 6-1**

STIPULATION TO FURTHER CONTINUE
DEADLINE TO RESPOND TO COMPLAINT
Case No. 5:16-cv-02192-EJD

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

Plaintiff Leslie Smith ("Plaintiff") and Defendant Chase Bank USA, N.A., erroneously sued as JPMorgan Chase Bank ("Chase"), through their undersigned counsel, hereby stipulate as follows:

WHEREAS, Plaintiff filed the Complaint in this action on April 22, 2016 (Dkt. No.1);

WHEREAS, the current deadline for Chase to respond to the Complaint is June 14, 2016;

WHEREAS, pursuant to Local Rule 6-1 the parties may stipulate in writing, without a Court order, to extend the time within which to answer or otherwise respond to the Complaint, provided the change will not alter the date of any event or any deadline already fixed by Court order;

WHEREAS, the parties agree to further continue the deadline for Chase to file and serve a response to the Complaint by two (2) weeks, to and including June 28, 2016, to allow Chase additional time to investigate the allegations in the Complaint;

WHEREAS, an additional two-week extension of time for Chase to respond to the Complaint will not alter the date of any event or any deadline already fixed by Court order;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiff, by Plaintiff's undersigned counsel, and Chase, by its undersigned counsel, that the deadline for Chase to respond to the Complaint shall be further continued from June 14, 2016 to June 28, 2016.

Dated: June 14, 2016

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
STEPHEN J. NEWMAN
JULIETA STEPANYAN

By: /s/ Julieta Stepanyan
Julieta Stepanyan

Attorneys for Defendant
CHASE BANK USA, N.A., erroneously sued
as JPMorgan Chase Bank

1 Dated: June 14, 2016

SAGARIA LAW- A PROFESSIONAL
CORPORATION

2
3 By: /s/ Elliot Gale
Elliot W. Gale

4
5 ELLIOT W. GALE
Egale@sagarialaw.com
6 SAGARIA LAW- A PROFESSIONAL
CORPORATION
7 2033 Gateway Place, 5th Floor
San Jose, CA 95110
8 Telephone: (408) 279-2288
Facsimile: (408) 279-2299

9 Attorney for Plaintiff
LESLIE SMITH

10 STROOCK & STROOCK & LAVAN LLP
11 2029 Century Park East
12 Los Angeles, California 90067-3086
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ECF Signature Certification

Pursuant to Civil L.R. 5-1(i)(3), I hereby certify that the content of this document is acceptable to Elliot Gale, counsel for Plaintiff, and that I have obtained Mr. Gale's authorization to affix his electronic signature to this document.

Dated: June 14, 2016

/s/ Julieta Stepanyan
Julieta Stepanyan

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

CERTIFICATE OF SERVICE

I hereby certify that, on June 14, 2016, copies of the foregoing **STIPULATION TO FURTHER CONTINUE DEADLINE FOR DEFENDANT CHASE BANK USA, N.A. TO RESPOND TO COMPLAINT FROM JUNE 14, 2016, TO JUNE 28, 2016, PURSUANT TO LOCAL RULE 6-1** were filed electronically and served by U.S. Mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.

By: /s/ Julieta Stepanyan
Julieta Stepanyan

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086